

REMARKS

Applicants respectfully request reconsideration and allowance in view of the following remarks.

Rejection of Claims 3, 4, 7-18, 25 and 27-28 Under 35 U.S.C. §103(a)

The Office Action rejects claims 3, 4, 7-18, 25 and 27-28 under 35 U.S.C. §103(a) as being unpatentable over Dutta (U.S. Patent No. 6,772,208) ("Dutta") in view of Narendran et al. (U.S. Patent No. 6,070,191) ("Narendran et al."). Applicants traverse this rejection. Applicants do not acquiesce that it would have been obvious to one of skill in the art to combine Dutta and Narendran et al. However, even if combined, Dutta and Narendran et al. fail to teach all the limitations of claim 3. Applicants shall first summarize the structure and function of Dutta and Narendran et al., then describe the limitations of claim 3. Applicants shall then explain the differences between Dutta and Narendran et al. and claim 3 and how these references fail to teach all the limitations of claim 3.

First, Applicants outline the approach described in Dutta. Dutta teaches a way to restrict free hyperlinking to particular web pages involving three entities, a web client, a content distributor, and a content producer. Dutta, FIG. 4A, 104, 112, 116. The client requests a web page from the content distributor. Dutta, FIG. 4A, 455. The content distributor sends a file with a link to document D at producer.com/32983.html. Dutta, FIG. 4A, 460. The client requests producer.com/32983.html from the content producer. Dutta, FIG. 4A, 465. The content producer serves document D to the client. Dutta, FIG. 4A, 475. The content producer then changes the location of document D and updates the information stored at content distributor to reflect the changed location. Dutta, FIG. 4A, 480.

Second, Applicants outline the approach taught in Narendran et al. Narendran et al. teach a server-side technique for processing client requests. Narendran et al., col. 1, lines 6-10.

Narendran et al. teach three entities, a client, document servers, and a redirection server.

Narendran et al., FIG. 2, 14-1, S1, S2, S3. The client requests a web page. The client request is sent to a redirection server which distributes requests among document servers having the document. The client requests the same link (to a redirection server) each time, but the request may be serviced by a different document server each time at the whim of the redirection server.

Applicants submit that neither of these references teaches the limitations of claim 3.

Claim 3 recites rewriting a pointer embedded in a document before serving the content to the client so that the content request will be served by a content distribution network as indicated by the rewritten pointer. In this scenario, there are three entities, a client, a server, and content distribution networks. The client requests a web page from the server. The server rewrites links in the page for that particular request from that particular client before serving the page to the client. Clients receive links to different content distribution networks having the desired content.

Dutta does not teach these limitations. Specifically, Dutta does not teach rewriting a pointer embedded in a document before serving the document to the client. Dutta teaches that "once the document is retrieved by the web client 112, the content producer server 116 may then modify the HTML file on the content distribution server 104 containing the hyperlink to the document." Dutta, col. 4, lines 63-66. Therefore, clearly, Applicants submit that Dutta fails to teach the claim limitations because Dutta only discusses modifying the HTML file after the document is retrieved by the web client.

Neither do Narendran et al. teach the limitations of claim 3, as asserted in the Office Action on pages 3 and 4. The Office Action cites Narendran et al. as teaching redirecting prior to fetching a document. Office Action, page 4. Therefore, this approach does not rewrite an embedded pointer in a document. The initial link served to the client in Narendran et al. is the same for each client. The link points to the redirection server, which then redirects requests to

various document servers. The link taught in Narendran et al. is the same each time and the redirection server handles the details after the request. The link is not rewritten, a request is redirected. Further, even if links are rewritten, they are not rewritten while embedded in a document. Further still, even if links are rewritten while embedded in a document, Narendran et al. teach a process that occurs after serving the document, not before. Therefore, Applicants submit that Narendran et al. fail at several levels to teach all the limitations of claim 3.

In the approach of claim 3, rewriting an embedded pointer occurs before serving the content to the client. This is significant difference from the cited art regarding the location and timing of the processing of pointers or links. Claim 3 recites redirection by rewriting a pointer before serving the content. Both Dutta and Narendran et al. teach a back-loaded approach which process and/or redirect requests after they are made. Even if blended, Dutta and Narendran et al. do not teach all the limitations of claim 3, specifically rewriting a pointer embedded in a document before serving the content to the client. Therefore, Applicants submit that claim 3 is patentable and in condition for allowance. Inasmuch as the references fail to teach each limitation of claim 3, Applicants do not address at this time whether it would be obvious of one of skill in the art to combine Dutta with Narendran et al. Applicants reserve the right to argue that the combination is inappropriate.

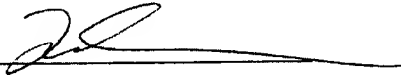
Applicants further submit that claim 25, which contains similar limitations to those found in claim 3, is patentable over Dutta and Narendran et al. for the same reasons. Applicants further submit that claims 4, 7-18, and 27-28 are patentable over Dutta and Narendran et al. inasmuch as they depend from and inherit all the limitations from claims 3 or 25, respectively. Therefore, Applicants submit that claims 3-4, 7-18, 25 and 27-28 are patentable and request that the 35 U.S.C. §103(a) rejection be withdrawn.

CONCLUSION

Having addressed all rejections and objections, Applicants respectfully submit that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited. If necessary, the Commissioner for Patents is authorized to charge or credit the **Novak, Druce & Quigg, LLP, Account No. 14-1437** for any deficiency or overpayment.

Respectfully submitted,

Date: February 2, 2009

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